

FILED

SEP 22 2021

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

THERESA MOSBY,

Defendant.

No **4:21CR00525 AGF/SRW**

INDICTMENT

The Grand Jury charges:

COUNT ONE

From on or about April 1, 2014 through March 30, 2021, within the Eastern District of Missouri, the defendant,

THERESA MOSBY,

did embezzle, steal, purloin, or knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$114,284.90 in the form of Social Security Administration benefit payments, as representative payee of L.W., creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

COUNT TWO

On or about April 5, 2020, within the Eastern District of Missouri, the defendant,

THERESA MOSBY,

in a matter within the jurisdiction of the Social Security Administration, a department of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, in a document entitled "Representative Payee Report," she did state and represent and cause to be stated and represented that L.W.'s Social Security benefits had been used for L.W.'s benefit, when **THERESA MOSBY** well knew, L.W. had been deceased since 2014.

In violation of Title 18, United States Code, Section 1001(a).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING,
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney